

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

SUMNER SQUARE
1615 M STREET, N.W.
SUITE 400
WASHINGTON, D.C. 20036-3215

(202) 326-7900

FACSIMILE:
(202) 326-7999

August 14, 2018

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) respectfully submits this letter concerning the status of its document production in jurisdictional discovery. This Court’s order dated May 24, 2018, ECF No. 4009, directed that Saudi Arabia’s production be completed by July 31, 2018. On July 31, 2018, Saudi Arabia made a production of 3,818 documents (6,674 pages) and indicated that a supplemental production might be necessary. Today, Saudi Arabia has made a supplemental production of 110 documents (179 pages). As set forth in my letter dated July 31, 2018, ECF No. 4078, those documents consist primarily of documents from the possession of Saudi Arabia’s General Authority of Civil Aviation (“GACA”) that were the subject of targeted follow-up requests made after initial searches of GACA’s offices.

My July 31 letter also referred to certain responsive documents under review by the U.S. Attorney’s Office for the purpose of determining whether they might contain information that the United States would consider privileged, protected, or otherwise immune from discovery. After completing its review, the United States has advised that it does not object to the production of most of those documents in unredacted form. Most of those documents are included in today’s supplemental production. The United States has requested the redaction of four documents. We intend to produce those four documents in redacted form, plus an additional two related unredacted documents, to Plaintiffs tomorrow. The United States has not requested that any documents be withheld in their entirety.

Except as set forth above, Saudi Arabia has now produced all documents responsive to the reasonable searches described in its discovery responses, *see* ECF No. 4004-5, and the Court’s May 24 Order, and it has withheld no documents on grounds of privilege, protection, or

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immunity. Saudi Arabia continues to investigate the facts and circumstances of this case and reserves the right to supplement its production as necessary or appropriate.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: Chambers of the Honorable George B. Daniels (via facsimile)
All MDL Counsel of Record (via ECF)